

INFORMATION SHEET

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

1. Title of Case: United States v. JOSE LOPEZ AREVALO aka "Payaso," + MANUEL VIGIL
aka - "Junior"
2. Related Magistrate Docket Number(s) _____
None (X)
3. Arrest Date: _____
4. Nature of offense(s): ☒ Felony
☐ Misdemeanor
5. Related Civil or Criminal Cases - Title and Docket No(s). (Pursuant to Rule 50.3 of the Local E.D.N.Y. Division of Business Rules): U.S. v. Berrios, et al., 06-CR-613 (SJ)
U.S. v. Gomez, 06-CR-620 (SJ)
6. Projected Length of Trial: Less than 6 weeks (X)
More than 6 weeks ()
7. County in which crime was allegedly committed: Queens
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
8. Has this indictment been ordered sealed? (X) Yes () No
9. Have arrest warrants been ordered? (X) Yes () No
10. Is a capital count included in the indictment? () Yes (X) No

ROSLYNN R. MAUSKOPF
UNITED STATES ATTORNEY

By:


MARSHALL MILLER
Assistant U.S. Attorney
(718) 254-6421

KTC: MLM
F.#2007RO0249

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

JOSE LOPEZ AREVALO,
also known as "Payaso," and
MANUEL VIGIL,
also known as "Junior,"

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

I N D I C T M E N T

Cr. No. _____
(T. 18, U.S.C., §§ 1959(a)(3),
2 and 3551 et seq.)

INTRODUCTION TO ALL COUNTS

At all times relevant to this Indictment:

1. La Mara Salvatrucha, also known as MS-13 (hereinafter "MS-13"), was a gang comprised primarily of immigrants from Central America, with members located throughout Queens, New York, Long Island, New York and elsewhere. The defendants JOSE LOPEZ AREVALO, also known as "Payaso," and MANUEL VIGIL, also known as "Junior," were members of MS-13.

2. Members of MS-13 sometimes signified their membership with tattoos containing, among other things, three dots and the words "MS," "13" and "Mara Salvatrucha," frequently written in gothic lettering. Members of MS-13 engaged in criminal activity, such as murder, assault, narcotics trafficking and robbery. Participation in criminal activity by a member,

especially violence directed at rival gangs, increased the respect accorded to that member and could result in a promotion to a leadership position. Members of MS-13 purchased, maintained and circulated a collection of knives and firearms for use in criminal activity. Members also paid dues to provide bail money to arrested members and travel expenses for members who fled the jurisdiction after committing gang-related offenses.

THE RACKETEERING ENTERPRISE

3. MS-13, including its leadership, membership and associates, constituted an "enterprise" as defined in Section 1959(b)(2) of Title 18, United States Code, that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

4. MS-13, through its members and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, acts and threats involving murder and robbery, in violation of the laws of the State of New York, and narcotics trafficking, in violation of Title 21, United States Code, Sections 841 and 846.

COUNT ONE

5. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.

6. On or about August 28, 2006, within the Eastern District of New York, the defendants JOSE LOPEZ AREVALO, also known as "Payaso," and MANUEL VIGIL, also known as "Junior," for the purpose of maintaining and increasing their positions in MS-13, an enterprise that was engaged in racketeering activity, did knowingly and intentionally assault an individual, to wit: John Doe #1, whose identity is known to the Grand Jury, with a dangerous weapon, to wit: a knife and a bicycle, in violation of New York Penal Law Section 120.05(2).

(Title 18, United States Code, Sections 1959(a)(3), 2 and 3551 et seq.)

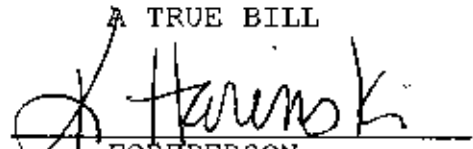
COUNT TWO

7. The allegations contained in paragraphs one through four are realleged and incorporated as if fully set forth in this paragraph.


8. On or about August 28, 2006, within the Eastern District of New York, the defendants JOSE LOPEZ AREVALO, also known as "Payaso," and MANUEL VIGIL, also known as "Junior," for the purpose of maintaining and increasing their positions in MS-13, an enterprise that was engaged in racketeering activity, did

knowingly and intentionally assault an individual, to wit: John Doe #2, whose identity is known to the Grand Jury, with a dangerous weapon, to wit: a knife and a BB-gun, in violation of New York Penal Law Section 120.05(2).

(Title 18, United States Code, Sections 1959(a)(3), 2 and 3551 et seq.)

A TRUE BILL

FOREPERSON

ROSLYNN R. MAUSKOPF
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. 0.136

